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10
11 **UNITED STATES BANKRUPTCY COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
SAN FRANCISCO DIVISION

13 In re:

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC**
17 **COMPANY,**
18 **Debtors.**

- 19 ☐ Affects PG&E Corporation
20 ☐ Affects Pacific Gas and Electric Company
21 ☒ Affects both Debtors

22
23 ** All papers shall be filed in the Lead Case,
24 No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**FIRE VICTIM TRUSTEE'S OBJECTION
TO CONSOLIDATED MOTION TO
ALLOW/DEEM TIMELY LATE FILING
OF CLAIMANTS, AND MEMORANDUM
OF POINTS AND AUTHORITIES AND
DECLARATION OF ROBERT M. BONE
IN SUPPORT THEREOF**

[Relates to Docket Number 13318]

Hearing Date: January 10, 2023

Hearing Time: 10:00 a.m.

Place: Hearing will be conducted telephonically or
by video

1 Cathy Yanni, in her capacity as the Trustee (the “**Trustee**”) of the Fire Victim Trust, by and
2 through her undersigned counsel, hereby submits this Objection to the *Motion to Allow/Deem*
3 *Timely Late Filing of Claimants, Memorandum of Points and Authorities and Declaration of*
4 *Robert M. Bone in Support Thereof* [Docket No. 13318] (the “**Motion**”) filed on December 6, 2022
5 on behalf of the one hundred ten (110) claimants (“**Movants**”) listed on Exhibit 1 hereto. In
6 support of this Objection, the Trustee respectfully states as follows:

7 **PRELIMINARY STATEMENT**

8 The Fire Victim Trust understands that the Fires caused by PG&E in 2015, 2017 and 2108
9 made it hard for survivors to undertake many everyday tasks due displacement, trauma and other
10 factors. The Trust has been extremely accommodating with respect to late claims and has made
11 every effort to allow as many Fire Victims as possible to present their claims to the Trust for
12 consideration. Nevertheless, the Trustee must balance the Trust’s efforts to address as many Fire
13 Victim Claims as possible against the fact that **82,692** Fire Victims – many of whom suffered
14 horrific losses – were able to file timely proofs of claim and are prejudiced by the acceptance of
15 late claims. All of those Fire Victims remain in the Trust today, waiting to learn how much of their
16 claims can be paid. Also waiting within the Trust are Fire Victims who mailed their proofs of
17 claim to the Debtors’ claims agent in New York prior to the Tuesday, December 31, 2019 deadline
18 but whose proofs of claim were not received by the claims agent until the end of that week due to
19 the holidays. Like Movants, those claimants had to file late claim motions to have their days-late
20 proofs of claim deemed timely. However, there is a fundamental difference between claimants
21 who file motions to have long-filed late proofs of claims deemed timely after receiving notice from
22 the Trust that such action is necessary and those who have made no attempt to engage with the
23 Trust before filing late claim motions for years-late proofs of claim.

24 In an effort to quell the rising tide of late claim motions being filed in this case, the former
25 Trustee stopped stipulating to the relief requested in late claim motions in mid-May of this year.
26 While that decision initially seemed to slow the number of motions being filed, once it became
27 clear that late claim motions were still being granted, the number of such motions being filed began
28 to increase again. Since the former Trustee stopped stipulating to the relief requested in late claim

1 motions, motions and letters have been filed requesting that the Court deem well over 1,000 proofs
2 of claim “timely” for the purpose of administration by the Trust. The majority of these letters and
3 motions have not presented unique circumstances but instead have duplicate previously filed late
4 claim letters and motions. One hundred fifty-five (155) late claim motions were filed in August
5 alone, prompting the Trustee to state in several filings with this Court that the Trust would have to
6 discontinue its liberal non-opposition policy with respect to late claim motions filed after
7 September 30, 2022. The deadline reflected the recognition that the assets available to the Trust to
8 pay claims (including the PG&E stock held by the Trust) do not account for the extreme increase in
9 the number of new proofs of claim being filed in the last six months.

10 Unfortunately, the Trustee’s statement regarding the change in policy prompted an
11 astounding 672 late claim motions to be filed on September 30, 2022 alone.¹ To put these numbers
12 in perspective, in 2020, which included the months immediately after both the extended bar date
13 and the effective date of the Trust (both events that could be expected to prompt the filing of late
14 claim motions), the total number of late claim motions filed alleging Fire Victim Claims was 55. In
15 2021, the total number was only 22. Based on historical data, the Trust had no reason to expect the
16 magnitude of the late claim motions and letters filed in the last six months based on historical data.
17 These late claim filings have covered *more than thirteen times the number of late proofs of claim*
18 *addressed by late claim motions filed in the previous two years combined.* Most of these late
19 proofs of claim (including Movants’ proofs of claim, all of which were filed in October 2022 or
20 later) were only recently filed. It is especially important that the Court recognize that *none of these*
21 *thousands of late-filed proofs of claim were considered when the amount of the Aggregate Fire*
22 *Victim Consideration² was determined and agreed to* by the Official Committee of Tort Claimants

23 _____
24 ¹ Although the Motion argues that the Court should disregard the Trustee’s decision to strictly
25 review late claim motions after September 30, counsel for Movants, who filed motions
26 consolidating 671 of the late claim motions filed on September 30, clearly expected that late claims
27 would no longer be unopposed thereafter.

28 ² Capitalized terms used but not defined herein have the meanings ascribed such terms in the
Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization dated June 19, 2020
(the “Plan”).

1 (the “TCC”) and counsel representing holders of Fire Victim Claims. Movant and all other late
2 claimants are requesting that the Court allow them to share in a limited fund that was expected to
3 fully compensate only those claimants who filed timely proofs of claim. In addition, all of these
4 new, unanticipated claims must be reviewed, evaluated and determined before the Trust can make
5 final payments to any of the tens of thousands of Fire Victims who have complied with all of the
6 Trust deadlines and who must wait until all approved claims are determined to learn how much of
7 their approved claims can be paid.

8 As of December 12, 2022, the Trust had awarded determination notices for **90% of all**
9 **claim questionnaires** that have been submitted to the Trust. The awards associated with those
10 determination notices total **\$14.04 billion**. Until all claims are determined, all determinations are
11 accepted and all of the Trust’s PG&E Stock is fully monetized, the Trust is unable to predict with
12 certainty the amount of funds available to pay Fire Victim Claims. The economic prejudice to the
13 Trust’s beneficiaries of allowing more late claims into the Trust is manifold, as an increasing
14 number of claims leads to increased administrative expenses and unanticipated adjustments to the
15 Trust’s economic modeling and payments. Further, as more fully explained below, all late claims
16 serve to delay final payment to Fire Victims who filed timely proofs of claim. Based on the Trust’s
17 records, that delay is significantly compounded when claims are added to the Trust by motions
18 consolidating numerous late claims.

19 **RELEVANT BACKGROUND**

20 1. On January 29, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and
21 Electric Company (“**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the
22 “**Debtors**”), commenced with the Court voluntary cases under chapter 11 of the Bankruptcy Code
23 (the “**Chapter 11 Cases**”). The Reorganized Debtors filed the Chapter 11 Cases to address the
24 billions of dollars of damage and loss relating to the devastating 2015, 2017 and 2018 California
25 fires and to provide compensation to wildfire victims.

26 2. On February 12, 2019, the United States Trustee (the “**U.S. Trustee**”) appointed an
27 Official Committee of Unsecured Creditors. On February 15, 2019, the U.S. Trustee appointed an
28 Official Committee of Tort Claimants (the “**TCC**”).

3. On March 14, 2019, the Debtors filed their schedules of assets and liabilities. By Order dated July 1, 2019, the Court established October 21, 2019 (the “**Bar Date**”) as the last date to file proofs of claim in the Chapter 11 Cases [Docket No. 2806] (the “**Bar Date Order**”). By Order dated November 11, 2019, the Court extended the Bar Date to December 31, 2019 (the “**Extended Bar Date**”) for unfiled, non-governmental Fire Claimants [Docket No. 4672] (the “**Extended Fire Victims Bar Date Order**”)

4. The Extended Fire Victims Bar Date Order was entered in response to a motion filed by the TCC. The TCC argued that the Bar Date “should be extended for the fire victims on the ground that evidence filed herewith establishes that a large number of victims are not filing claims in these chapter 11 cases because they are impaired from filing. Their impairments include emotional distress, suffering from trauma caused by the wildfire that destroyed everything they own, confusion caused by the trauma, a lack of awareness of the fire claims bar date, and a belief that a claimant needs to be insured to file a claim.” [Docket No. 4293 at 5:2-8]. In considering the TCC motion and approving the resulting stipulation between the TCC and the Debtors, this Court has already considered and addressed the adequacy of notice to Fire Victims. Movants’ allegation that “in this case, there was no widely distributed notice to residents impacted by the subject fires” is contrary to the facts well-known by this Court. The Debtors provided a well-publicized notice of the Extended Bar Date – the *second notice* provided to Fire Victims of the claims bar date – and coordinated with TCC for the appointment of a Claims Representative who designed and implemented with his team an expansive outreach effort designed to identify, locate, and assist Fire Victims who were eligible to file claims but failed to do so by the original bar date. As a result of the Court’s careful consideration of this issue and the thoughtful manner in which the Debtors redoubled their efforts to reach additional Fire Victims, more than 82,000 claimants, some of whom suffered unfathomable losses, filed their claims in a timely manner.

OBJECTION

5. Movants assert that their delays in filing their proofs of claim – between 1,006 and 1,069 days after the Extended Bar Date – were “reasonable” because they only recently learned that their claims were compensable. Yet there are more than 1,700 Fire Victims who filed claims for

1 injuries similar to those asserted by Movants – emotional distress claims that were not associated
2 with a submitted property claim – before the Extended Bar Date, without waiting to see if they
3 would receive compensation for those claims. Importantly, this figure does not include claimants
4 (for example, children) whose claims were submitted on the same proof of claim as another
5 claimant who asserted property-related claims (such as a parent). Clearly, Movants’ claim that they
6 “received absolutely no notice whatsoever of their entitlement to file claim” is overstated at best.
7 Even before the second bar date notice specifically targeted at Fire Victims, this Court approved a
8 notice of the original bar date for Fire-related claims that stated, “[i]f you believe you have a claim
9 against either of the Debtors for personal injury or wrongful death, property damage, or other loss
10 resulting from or in any way relating to the Northern California Fires, you or your authorized agent
11 or attorney MUST file a Proof of Claim for your Fire Claim prior to the Bar Date in accordance
12 with the instructions in this notice.” [Docket No. 2806 Exhibit B-2]. Contrary to Movants’
13 assertions, Debtors are not required to inform potential claimants of what claims they may have or
14 whether such claims will ultimately be compensable. Such a process would be untenable, as it
15 would necessarily place claims administration ahead of the filing of proofs of claim. As explained
16 in the following paragraphs, Movants’ delay in filing their proofs of claim is not a result of
17 excusable neglect and their proofs of claim should not be deemed timely filed for the purpose of
18 administration by the Trust.

19 **Equity Does not Favor Movants**

20 6. As Movants acknowledge, The Supreme Court has opined that “that the
21 determination [of whether to allow a late-filed claim to be deemed timely] is at bottom an equitable
22 one, taking account of all relevant circumstances surrounding the party's omission.” *Pioneer Inv.*
23 *Services Co. v. Brunswick Associates Ltd. Partnership*, 507 U.S. 380, 395, 113 S. Ct. 1489, 1498
24 123 L. Ed. 2d 74 (1993). The interests the Court is being asked to balance here is not those of
25 Movants versus those of the Debtors as framed in the Motion, but those of Movants versus those of
26 more than 82,000 Fire Victims who filed proofs of claim by the Extended Bar Date despite often
27 seemingly insurmountable odds. All of those timely Fire Victims must wait until *all* claims –
28 including those that Movants are asking to be deemed timely now – have been determined before

1 they will find out how much of their claims can be paid. It would be grossly inequitable to allow
2 Movants' late claims to dilute and delay the payment of timely filed claims held by Fire Victims
3 who have engaged with the Trust from its inception.

4 7. The Motion relies primarily upon the Supreme Court opinion in *Pioneer*. Notably,
5 in *Pioneer*, counsel had filed the claimant's proof of claim only 20 after the bar date in that case
6 and the Supreme Court found that the bar date notice in that case contained a "dramatic ambiguity"
7 regarding the bar date. By contrast, Movants' proofs of claim were filed **at least 1,006 days after**
8 **the Extended Bar Date**, with the last of the consolidated proofs of claim being filed on December
9 4, 2022. As noted above, the notice of the Extended Bar Date was the *second* notice provided to
10 potential Fire Victims and it was carefully crafted to inform that group of the deadline to file any
11 claims arising from a Fire. Contrary to Movants' allegations in the Motion, neither the Debtors nor
12 the Trust had a responsibility to determine whether Movants' alleged claims were compensable or
13 to inform Movants (or any other potential claimant) whether their alleged claims were
14 compensable.

15 8. While courts have decided that there is no harm to *the debtor* in allowing late claims
16 to be considered when a solvent debtor is paying all claims in full in a bankruptcy case, in this case
17 the Debtors are not paying any additional consideration to the Trust no matter how many late
18 claims are added. Pursuant to Section 6.8(b) of the Plan and Paragraph 18(e)(iii) of the
19 Confirmation Order, the Trustee has stepped into the Debtors' shoes with respect to Fire Victim
20 Claims. The relevant inquiry in a request to deem a late Fire Victim Claim timely is how the
21 requested relief will affect the Trust rather than the Debtors, and specifically the effect on the
22 Trust's beneficiaries, the Fire Victims. Here, all Fire Victim Claims are channeled to the Trust,
23 which was funded with limited assets under the Plan. All Fire Victim Claims that have been
24 determined by the Trust so far have taken into consideration the expected number of Fire Victim
25 Claims *that were left to be paid as of the date those determinations were made*. Every late claim
26 accepted by the Trust – even those that are ultimately deemed non-compensable – takes time and
27 money from Fire Victims who have met all deadlines and are waiting for their final payments.

28 ///

1 9. The Supreme Court has recognized that Bankruptcy Rule 9006(b)(1) permits
2 bankruptcy courts to accept proofs of claim filed after the bar date *where appropriate* in cases of
3 excusable neglect due to inadvertence, mistake, carelessness or circumstances beyond the
4 claimant's control. *Pioneer*, 507 U.S. at 388, 113 S. Ct. at 1495. As the dissent in *Pioneer*
5 recognized, however, "the statute does not *require* the court to forgive every omission caused by
6 excusable neglect, but states that the court "*may*" grant relief "in its discretion." *Id.*, 507 U.S. at
7 399, 113 S. Ct. at 1500 (emphasis in original).

8 10. The threshold determination to be made under Bankruptcy Rule 9006(b)(1) is
9 whether Movants' failures to file their proofs of claim in this case resulted from excusable neglect.
10 Movants have not provided any facts that would support a finding of "excusable neglect." Rather
11 than "setting forth brief statements of their particular circumstances" as required by the Court's
12 August 28, 2022 *Order Consolidating Motions to File Late Claims* [Docket No. 12875], Exhibit 1
13 to the Motion repeats the same boiler plate language for each of the Movants as has been used by
14 Movants' counsel in hundreds of earlier late claim motions.

15 11. As this Court has recognized, claimants who file late proofs of claim bear "the
16 burden of presenting facts demonstrating excusable neglect." *In re Pacific Gas & Elec. Co.*, 311
17 B.R. 84, 89 (2004) (citing *Key Bar Invs., Inc. v. Cahn (In re Cahn)*, 188 B.R. 627 (9th Cir. BAP
18 1995)). The use of boiler plate language in place of particular circumstances and claiming that
19 Movants should have been specifically informed whether their particular claims were compensable
20 does not meet this burden.

21 12. The Motion states that Movants did not file proofs of claim before the Extended Bar
22 Date because they were unaware that their claims were compensable. However, in discussing the
23 "excusable neglect" standard of Bankruptcy Rule 9006(b)(1), the Supreme Court referred to the
24 interpretation of Rule 6(b) of the Federal Rules of Civil Procedure and acknowledged that
25 "inadvertence, ignorance of the rules, or mistakes construing the rules do not
26 usually constitute 'excusable' neglect." *Pioneer*, 507 U.S. at 392, 113 S. Ct. at 1496. Ignorance is
27 not a sufficient excuse and equity cannot favor a claimant who pleads ignorance over tens of
28 thousands who followed the rules.

1 13. The Motion does not assert that Movants were unable to file timely claims due to
2 circumstances beyond their control or otherwise establish excusable neglect for waiting nearly
3 three years after the Extended Bar Date to file proofs of claim. Rather, it asserts that the Debtors
4 (and the Trust, which did not exist prior to July 1, 2020, more than six months after the Extended
5 Bar Date) made “little to no substantial effort . . . to alert prospective claimants of their right or
6 entitlement to file a claim.” Movants cite *In re ZiLOG, Inc.*, 450 F.3d 996 (9th Cir. 2006), to
7 support the allegation that the Debtors should have informed every potential claimant, known or
8 unknown, whether he or she had a compensable claim. However, *ZiLOG* involved a Debtor that
9 sent its employees confusing instructions regarding the filing of proofs of claim, which the Court of
10 Appeals found likely to cause the claimants in that case to believe that they did not have to file
11 proofs of claim in their employer’s bankruptcy case. Here, the Debtors made no such statements.
12 Rather, the Debtors, the TCC, the court-appointed Claims Representative and Prime Clerk made a
13 concerted effort to inform Fire Victims of the deadline to file a proof of claim for any claims
14 arising from the enumerated Fires. As noted in the *Second and Final Report of Court Appointed*
15 *Claims Representative* [Dkt. 5432], their effort to identify, locate and assist “fire victims who were
16 eligible to file claims but failed to do so by the original bar date” resulted in an additional **9,265**
17 proofs of claim being timely filed after the original claims bar date. *Dkt. 5432* at page 4.

18 **Application of Pioneer Factors**

19 14. In *Pioneer* the Supreme Court applied the majority of what was then the Ninth
20 Circuit test for determining whether a failure to timely file a proof of claim was due to excusable
21 neglect: (1) whether granting the delay will prejudice the debtor; (2) the length of the delay and its
22 impact on efficient court administration; (3) whether the delay was beyond the reasonable control
23 of the person whose duty it was to perform; and (4) whether the creditor acted in good faith. *Id.*,
24 507 U.S. at 395, 113 S. Ct. at 1498.

25 **Deeming Movants’ Late Claims “Timely” Will Prejudice Other Fire Victims**

26 15. The first consideration in determining whether a late claim filing was the result of
27 “excusable neglect” under *Pioneer* is the danger of prejudice to the debtor. This factor is irrelevant
28 in the present case because the Trust has taken the place of the Debtors with respect to Fire Victim

1 Claims. While it is true that the relief requested in the Motion will not prejudice the *Debtors*,
2 which have already satisfied their funding obligations to the Trust under the Plan, it most certainly
3 prejudices the Trust and its beneficiaries tens of thousands of claimants who timely filed proofs of
4 claim arising from Fires in these cases.

5 16. As noted above, the *Pioneer* Court noted that “that the determination is at bottom an
6 equitable one, taking account of all relevant circumstances surrounding the party's omission.” *Id.*
7 Equity does not support the filing of a late claim because claimants have just realized that others
8 are being paid by the Trust for similar claims. This Court already considered and confirmed the
9 adequacy of the notice of the Extended Bar Date and thousands of Fire Victims with similar claims
10 filed timely claims. For these reasons, the first factor does not support allowing Movants’ late
11 claims.

12 **The Length of Movants’ Delay is Extreme and Negatively Impacts Trust Administration**

13 17. The second consideration under *Pioneer* is the length of delay and its potential
14 impact on judicial proceedings. Movants filed their proofs of claim a minimum of **1,006 days**
15 **after the Extended Bar Date** yet claim that their nearly three-year delays were “reasonable.” As
16 noted above, the Trust has a limited fund from which to pay all Fire Victim Claims. As such, the
17 Trust cannot finally determine how much it can pay on account of any Fire Victim Claim until it
18 adjudicates every Fire Victim Claim.

19 18. The continued addition of claims to the Fire Victim Trust prevents the Trust from
20 allocating its limited funds and further extends the time that claimants who timely filed their Fire
21 Victim Claims must wait for final payments, thus delaying the administration of Fire Victim
22 Claims and prejudicing those who hold timely filed Fire Victim Claims with delay.

23 19. If allowed in the Trust, each of the Movants must file a claims questionnaire before
24 the Trust can even begin to administer their claims. Movants’ counsel has still not submitted
25 claims questionnaires for the majority of the claims included in their September consolidated late
26 claim motions. Based on this pace, it is likely that the Trust would not be able to begin to
27 administer Movants’ claims for at least several months. As noted in a recent letter to this Court
28 from a Fire Victim, these delays “are holding up the rest of us!” [Dkt. No. 13365]. The extreme

length of Movants' delay and the impact of a nearly three-year delay on the final payment of timely filed Fire Victim Claims weighs heavily against deeming Movants' claims timely.

Timely Filing Proofs of Claim was not Beyond Movants' Control

20. The third *Pioneer* factor, whether the delay was beyond the late claimant's control, also weighs against granting the relief requested in the Motions. As explained above, the Motion does not provide any basis for a finding of excusable neglect. The boiler plate statements used to describe Movants' circumstances failure to explain what prevented Movants from filing proofs of claim earlier. While the Motion states that Movants did not know they had compensable claims, the very case cited by Movants' counsel in support of deeming their extremely late claims "timely" acknowledges that ignorance is not a sufficient excuse. *See Pioneer*, 507 U.S. at 392, 113 S. Ct. at 1496.

21. Although the Trust does not minimize Movants' claims in any way, tens of thousands of other claimants with emotional distress claims and other similar claims arising from the North Bay Fires were able file timely proofs of claim. This Court determined that notice to all potential Fire Victims was sufficient in connection with both bar orders. There is no evidence that Movants made any effort to reach out to the Trust in the two and a half years it has existed. The third *Pioneer* factor therefore must also be decided in favor of the Trust and the Fire Victims who have made the effort to engage with the Trust.

Even Without Bad Faith, Equity Does Not Favor Movants Over Other Fire Victims

22. While the Trustee does not believe that Movants lack the good faith that comprises the final consideration listed by the *Pioneer* court, it is clear from the Motion that Movants were not prevented from filing timely claims by any circumstances. None of Movants' neighbors who filed timely proof claims knew whether the Trust would compensate them for every claim they asserted against PG&E, yet they filed their claims before the Extended Bar Date rather than waiting to hear what others had received from the Trust. Many filed without the benefit of counsel to guide them through the process. The Motion fails to state any facts that justify Movants' nearly three-year delay in filing their proof of claim.

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23. In addition, as is evidenced by overwhelming number of late claim motions filed within the two weeks alone, allowing Movants' proof of claim to be deemed timely filed without extenuating circumstances would encourage other latecomers to file similar motions. The Trustee provided notice that the Trust would begin strictly reviewing all late claim motions filed after September 30, 2022. The September 30 "deadline" was widely disseminated by social media and other "word of mouth" sources that Movants claim gave them notice their claims were compensable. Deeming late claims timely absent extenuating circumstances after such notice would be grossly inequitable to those holding timely filed Fire Victim Claims.

24. For the foregoing reasons, Movants fail to meet their burden for establishing “excusable neglect” for filing their proofs of claim nearly three years after the Extended Bar Date. Movants’ proofs of claim listed on Exhibit 1 hereto should not be deemed timely for the purpose of administration by the Trust.

CONCLUSION

The Trustee respectfully requests that this Court deny the relief requested in the Motion and grant the Trust such other and further relief as may be just.

DATED: December 19, 2022

BROWN RUDNICK LLP

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EXHIBIT 1

List Of Movants' Proofs Of Claim

	CLAIMANT(S)	POC NUMBER(S)	POC FILING DATE
1.	Keith Mason Crownover Lori Ann Crownover	109585	10/02/2022
2.	Barbara O'Connor Gary Parsons	109584	10/02/2022
3.	Kenneth Paul Tinkham Renee Marie Tinkham Mason Parker Tinkham Hayden Thomas Tinkham	109583	10/2/2022
4.	Banyan Parker Garrett Parker Zakary Parker Deklin Parker	109582	10/2/2022
5.	Robert Burns Penny Burns	109581	10/2/2022
6.	Ernest Carter, Jr. Kathleen Ann Carter	109671	11/11/2022
7.	Nancy Ramos Luis Ramos Olivia Ramires Santino Ramos	109670	11/11/2022
8.	Sue Thurston Zack Thurston Samantha Thurston	109673	11/11/2022
9.	Shelly Schubert Landon Schubert Carley Schubert	109672	11/11/2022
10.	Steven Salfi Carmen Salfi Paytin Salfi Cambryel Salfi Isabella Salfi Mary Salfi	109674	11/11/2022
11.	Randy James Dodson Cari Dodson	109675	11/11/2022
12.	Loyde Johnson Sherry Johnson	109677	11/16/2022
13.	Kristine Burns-Stirnaman Emilie Stirnaman	109680	11/11/2022

	CLAIMANT(S)	POC NUMBER(S)	POC FILING DATE
14.	Donald Mills Mary Miller James Mills Helen Mills	109679	11/16/2022
15.	Leah Fowler	109683 10971 (duplicative)	11/16/2022
16.	Kinsey Hudson Kamdyn Coggins Klayton Coggins	109678	11/16/2022
17.	Tiffany Johnson Haily Johnson Sara Johnson Anthony Johnson Tatiana Johnson Cloey Johnson	109681	11/16/2022
18.	Scott Booth Catherine Booth	109686	11/16/2022
19.	Janet Boyd Gerald Boyd	109682	11/16/2022
20.	Mark Tannehill Lupe Tannehill	109685	11/16/2022
21.	Julie Bertoli Jeff Bertoli	109699	11/16/2022
22.	Cheryl Diehm	109697	11/16/2022
23.	Clarence Younger	109687	11/16/2022
24.	Laura Graber Charlie Graber	109689	11/16/2022
25.	Desa Juarez Casi Juarez	109691 109701 (duplicative)	11/16/2022
26.	Grace Martin Natalie Martin Nick Martin Joey Martin	109690	11/16/2022
27.	Karl Nonamaker	109693	11/16/2022
28.	Richard J. Seitz Gay A. Seitz Caylie R. Seitz Calan I. Seitz	109692	11/16/2022

	CLAIMANT(S)	POC NUMBER(S)	POC FILING DATE
29.	Beth Streets Kenneth Streets	109694	11/16/2022
30.	Debbie Ausiello Armand Ausiello	109688	11/16/2022
31.	Thuan Lee	109698	11/16/2022
32.	Judith A. Schapansky Andrew A. Weinberg	109696	11/16/2022
33.	Thomas Parker Shirley Parker	109695	11/16/2022
34.	Jason VanAlen	109702	11/19/2022
35.	Jayne Ring Slayton Timothy Dean Slayton	109703	11/19/2022
36.	Taylor Bathke Victoria I. Nelson Troy Tomas Bathke	109829	11/19/2022
37.	Arnold Fred Stellema Nannette Lynn Meyers Alexander James Stellema Elizabeth Anne Stellema Victoria Lynn Stellema	109716	11/19/2022
38.	Mary Keith Roberts	109742	11/19/2022
39.	Angela Haseltine	109705	11/19/2022
40.	Rebecca Sanchez Pedro Espana Alexjandro Espana Eric Espana Adeline Ramirez Nathaniel Ramirez	109721	11/19/2022
41.	Edeltraud Petermann	109724	11/19/2022
42.	Jill Christensen	109709	11/19/2022
43.	Holly Rose Ortega Christopher Ortega Rebecca Lynn Nielson	109720	11/19/2022
44.	Katrina Lidholm Melia Vielma Victor Rodriguez	109717	11/19/2022

	CLAIMANT(S)	POC NUMBER(S)	POC FILING DATE
45.	Bere Ramos Olivia Ramirez Santino Ramos Katia Ramos Luis Ramos Nancy Ramos	109707	11/19/2022
46.	Janet Stapleton	109710	11/19/2022
47.	Bridget D. Newcomb	109636	10/05/2022
48.	Melanie Martinez	109578	10/02/2022
49.	Allen James Moore Donna Marie Moore	109718	11/19/2022
50.	Ykeallo Hezchias Tebletz Bein Sawait Seyoum Dawit Seyoum Sahyim Seyoum Mia Seyoum Simona Seyoum	109722 109769 (duplicative)	11/19/2022
51.	Kelly Johnson Anna Fox Tyler Fox	109743	11/19/2022
52.	Molly McGuire-Nunn Jacob Nunn Dylan Nunn Graysen Reno-Nunn	109760	11/19/2022
53.	Raves Faull Rene Faull	109714	11/19/2022
54.	Babak Sariaslani Malisa Evets Roya Sariaslani Harlow Sariaslani Fateme Sariaslani Ghazal Sariaslani Dan Snyder Brayan Gomez	109713	11/19/2022
55.	Cheyne Thompson Casey Thompson Celeste Thompson	109726	11/19/2022
56.	Carol Faull	109728	11/19/2022

	CLAIMANT(S)	POC NUMBER(S)	POC FILING DATE
57.	Daniel Macler Melissa Locks Mason Locks Mia Locks	109725	11/19/2022
58.	Suzie Schlick	109729	11/19/2022
59.	Sydney Brewer Jeremy Brewer	109731	11/19/2022
60.	Tom Kille Erma Kille	109730	11/19/2022
61.	Oliva Edwards Colette Edwards	109727	11/19/2022
62.	Barry Miller Amy Miller Laine Miller Sidney Miller	109745	11/19/2022
63.	Sharon Justin Doreen Burwell	109747	11/19/2022
64.	Helena Torre-Minto	109830	11/19/2022
65.	Jeffrey Alan Hendrix Angela Lynn Hendrix Alex Mason Hendrix Max Miranda Hendrix	109761	11/19/2022
66.	Sean Hubert Jennifer Hubert Ryan Hubert Colin Hubert	109753	11/19/2022
67.	Clarissa Harris Travis Harris Julia Harris	109831	11/19/2022
68.	Eric Sumner Nikki Crocker Sierra Sumner Treston Sumner	109758	11/19/2022
69.	Diane K. Cox	109755	11/19/2022
70.	Timothy Keehn Aida Herresa-Keehn	109732	11/19/2022
71.	Heather Jackson Jacob Jackson Steven Gomez	109704	11/19/2022

	CLAIMANT(S)	POC NUMBER(S)	POC FILING DATE
72.	Kelsey Fox	109735	11/19/2022
73.	Janet Bell Hall Jannay Avelar Janson Alex Avelar	109741 109734 (duplicative)	11/19/2022
74.	Denise Pena Emilio Pena Miranda Rose Pena Mario Carlo Refugio Pena	109737	11/19/2022
75.	Noemi Enriquez Monique Urbie Angel Uribe Nevaeh Moreno	109736	11/19/2022
76.	Daren Babcock	109706	11/16/2022
77.	Alan Keith Amanda Rose Keith Thomas James Keith Zakery Alan Keith	109748	11/19/2022
78.	John Dolan Esther Dolan	109738	11/19/2022
79.	William Zeeb Jolen Kalani Ann Spears Michael Anthony Tattner	109740	11/19/2022
80.	Danny Fish Debbie Fish	109708	11/20/2022
81.	Daphne Peterson Donald Peterson James Peterson	109750	11/20/2022
82.	Brandon M. Ingersoll Kristen Ingersoll Carter Ingersoll Mason Ingersoll Evan Ingersoll	109759	11/20/2022
83.	Cynthia Clark Springer Donald Springer	109767	11/20/2022
84.	Richard Lombardo April Lombardo Crosby Lombardo	109766	11/20/2022
85.	Paul Kay Lindauer	109751	11/20/2022

	CLAIMANT(S)	POC NUMBER(S)	POC FILING DATE
86.	Silvia Y. Barreto Castanon Francisco Saul Flores Munguia Jorge A. Barreto Sophia A. Flores	109770	11/20/2022
87.	Mary McConnell	109771	11/20/2022
88.	Carrie Smyth Laird Doherty	109772	11/20/2022
89.	Deanna Holzapfel Gavid Holzapfel Noelle Holzapfel Asher Holzapfel	109832	11/20/2022
90.	William Haga, II Margaret Haga	109764	11/20/2022
91.	Ann Hudson Geoffrey Hudson Cole Hudson Lauren Hudson	109752	11/20/2022
92.	Heidi Lynne Adler	109756	11/20/2022
93.	Trevor Larsen	109757	11/20/2022
94.	Tina Wells	109763	11/20/2022
95.	Elizabeth Alice Weeks Gordon Douglas Wilder	109762	11/20/2022
96.	Michael Pina	109749	11/20/2022
97.	Patrick Clifton McGee	109746	11/20/2022
98.	Nicholas Joseph Kersmarki Lindsay Virginia Kersmarki Abigail James Kersmarki Micah Starke Kersmarki	109715	11/20/2022
99.	Becky Thomas	109723	11/20/2022
100.	Nisa Falk Brian Falk Gage Falk Milani Falk Damon Falk Kyra Devries	109775	11/21/2022

	CLAIMANT(S)	POC NUMBER(S)	POC FILING DATE
101.	John Fruiht Jessica Fruiht Brad Fruiht Briane Fruiht	109774	11/21/2022
102.	Louis D. Lopez Chantal Hernandez Davian Lopez	109780	11/23/2022
103.	Laura Fry Tim Fry Alexander Fry Caroline Fry Felicity Fry	109779	11/23/2022
104.	Michael Resch Darcy Resch Charlotte Maley Amadea Resch Mikaela Resch Atticus Resch	109778	11/23/2022
105.	Norma Douglas	109777	11/23/2022
106.	Valerie Henry Angelo Santoni Henry Santoni Benjamin Santoni Roberta Pugh Sara Santoni	109803	11/30/2022
107.	Charlene Nicholson	109783	12/01/2022
108.	Richard J. McChinak, III Halie Matlock Jeff Magee Jack Boynton	109791	12/01/2022
109.	Melanie Luce Eric Luce Eric Anthony Luce Travis Luce	109818	12/02/2022
110.	Jennifer Rose West Jason Wade West Mason Michael West Avery Rose West	109815	12/04/2022